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19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**  
26 **DISTRICT OF NEVADA**

27 U.S. BANK NATIONAL ASSOCIATION  
28 AS TRUSTEE FOR TERWIN MORTGAGE  
29 TRUST 2004-13 ALT, ASSET-BACKED  
30 CERTIFICATES, TMTS SERIES 2004-  
31 13ALT,

32 Plaintiff,

33 vs.

34 FIDELITY NATIONAL TITLE GROUP,  
35 INC., et al.,

36 Defendants.

Case No.: 2:20-cv-02239-GMN-VCF

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF No.  
10] AND MOTION FOR FEES AND  
COSTS [ECF No. 11]**

**(First Request)**

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank  
2 National Association as Trustee for Terwin Mortgage Trust 2004-13 ALT, Asset-Backed  
3 Certificates, TMTS Series 2004-13ALT (“U.S. Bank”) (collectively, the “Parties”), by and  
4 through their counsel of record, hereby stipulate and agree as follows:

- 5 1. On December 10, 2020, U.S. Bank filed its Complaint in the Eighth Judicial District  
6 Court, Case No. A-20-826129-C [ECF No. 1-1];
- 7 2. On December 10, 2020, Chicago Title filed a Petition for Removal to this Court [ECF  
8 No. 1];
- 9 3. On January 11, 2021, U.S. Bank filed a Motion for Remand [ECF No. 10];
- 10 4. On January 11, 2021, U.S. Bank filed a Motion for Costs and Fees [ECF No. 11];
- 11 5. Chicago Title’s deadline to respond to U.S. Bank’s Motion for Remand and Motion  
12 for Costs and Fees is currently January 25, 2021;
- 13 6. Chicago Title’s counsel is requesting an extension until Monday, February 8, 2021, to  
14 file its response to the pending Motion for Remand and Motion for Costs and Fees;
- 15 7. Chicago Title requests a brief extension of time to respond to the Motion for Remand  
16 and Motion for Costs and Fees to afford Chicago Title additional time to respond to  
17 the legal arguments set forth in U.S. Bank’s motions;
- 18 8. U.S. Bank does not oppose the requested extension;
- 19 9. This is the first request for an extension which is made in good faith and not for  
20 purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion  
2 for Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby extended  
3 through and including February 11, 2021.

4  
5 Dated: January 22, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
8 SCOTT E. GIZER  
9 SOPHIA S. LAU  
Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

10 Dated: January 22, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
12 KEVIN S. SINCLAIR  
13 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

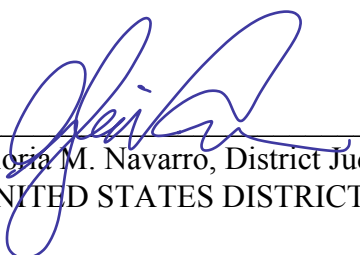
14 Dated: January 22, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins  
16 LINDSAY D. ROBBINS  
17 Attorneys for Plaintiff U.S. BANK, N.A.

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20 **IT IS SO ORDERED.**

21 Dated this 22 day of January, 2021

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25 Gloria M. Navarro, District Judge  
26 UNITED STATES DISTRICT COURT  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

